

LAW OFFICES OF THOMAS K. CROWE, P.C.

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February 8, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

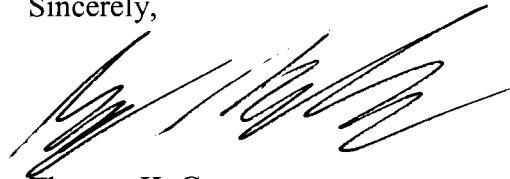
Re: Docket WC 06-31; Amendment to Application for
Consent to Transfer Control of International and Domestic Carrier

Dear Ms. Dortch:

On January 24, 2006, Zone Telecom, Inc. filed an Application for Consent to Transfer Control of International and Domestic Carrier ("Application") regarding the proposed purchase of certain assets of Central Utah Communications Leasing, LC. As discussed with Commission staff, Zone Telecom, Inc. hereby amends the Application to provide the attached additional ownership information with respect to Zone Telecom, Inc.

Please direct questions regarding this filing to the undersigned.

Sincerely,



Thomas K. Crowe
Gregory E. Kunkle*,
Counsel for Zone Telecom, Inc.

Attachment

* Admitted only in Virginia. Practice limited to federal communications matters.

Supplement to Answer to Question 11

The following entities currently hold a ten percent (10%) or greater direct ownership interest in e-Kong Group Limited:

<u>Name/Address</u>	<u>% of Shares</u>	<u>Citizenship/ Country of Incorporation</u>	<u>Principal Occupation/ Business</u>
Goldstone Trading Limited c/o Unit C, 26/F. CNT Tower 338 Hennessy Road Wanchai, Hong Kong	20.9%	British Virgin Islands	Investment Holding
Great Wall Holdings Limited c/o Room 402 Hung Kei Mansion 5-8 Queen Victoria Street Central, Hong Kong	14.4%	Niue	Investment Holding
Future (Holdings) Limited Unit C, 26/F. CNT Tower 338 Hennessy Road Wanchai, Hong Kong	14.4%	Saint Lucia	Investment Holding

In addition, the following individuals currently hold a ten percent (10%) or greater attributable ownership interest in Zone Telecom, Inc. through an attributable ownership interest (direct and/or indirect) in e-Kong Group Limited:

<u>Name/Address</u>	<u>% Ownership</u>	<u>Citizenship/ Country of Incorporation</u>	<u>Principal Occupation/ Business</u>
Richard John Siemens	21.4% ¹	Canada	Company Director

¹ 21.4% ownership interest attributed as follows: 20.9% indirect ownership interest through controlling interest in Goldstone Trading Limited; .5% indirect ownership interest through controlling interest in Siemens Enterprises Limited, a Hong Kong investment holding company with an address of Unit C, 26/F., CNT Tower, 338 Hennessy

3705 Gloucester Tower
The Landmark
11 Pedder Street
Central, Hong Kong

William Bruce Hicks House No. 2 Henderson Road Jardine's Lookout Hong Kong	15% ²	Canada	Company Director
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Kuldeep Saran 3705 Gloucester Tower The Landmark 11 Pedder Street Central, Hong Kong	14.4% ³	India	Company Director
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No other entities or individuals hold a ten percent (10%) or greater attributable ownership interest in e-Kong Group Limited or Zone Telecom, Inc.

Road, Wanchai, Hong Kong. Siemens Enterprises Limited holds a .5% direct ownership interest in e-Kong Group Limited.

² 15% ownership interest attributed as follows: 14.4% indirect ownership interest through controlling interest in Great Wall Holdings Limited; .6% indirect ownership interest through shares held personally in e-Kong Group Limited.

³ 14.4% ownership interest attributed as follows: 14.4% indirect ownership interest through controlling interest in Future (Holdings) Limited; *de minimis* (*i.e.*, less than .1%) indirect ownership interest through shares held personally in e-Kong Group Limited.